



January 11, 2008

Attn: Regulations and Standards Branch (RSB)  
Department of the Interior  
Minerals Management Service  
381 Elden Street  
MS-4024  
Herndon, VA. 20170-4817

RE: **RIN 1010-AD11**  
**Pipeline and Pipeline Rights-of-way**  
**Additional Request for Time Extension for Comments to OMB**

The Interstate Natural Gas Association of America's (INGAA) members operate an extensive interstate natural gas transmission system, of which approximately 14,000 miles are offshore. These pipeline systems receive natural gas from the major production areas of the Gulf Coast for transportation and sale. The operation of these pipeline systems is subject to the requirements of Title 49 Code of Federal Regulation Parts 190, 191, 192, 193, and 199 and Title 30 Code of Federal Regulations Part 250, Subpart J, regarding Pipeline Rights-of-Way

INGAA previously submitted a request for an extension of time in order to prepare comments per the notice at Volume 72, No. 191 FR 56442, which was received by both the Office of Management and Budget (OMB) and Regulations and Standards Branch (RSB) of the Department of Interior (DOI) on October 25, 2007.

At that time, INGAA pointed out that this rulemaking is significant and that the administrative burden has been underestimated. INGAA further pointed out that it would take longer than the November 2 deadline to prepare complete comments. INGAA requested that the deadline for comments to OMB be extended from November 2, 2007 to the same as that for the rule comments to DOI, January 31, 2008. We have received verbal confirmation of a time extension from MMS, but no written confirmation.

INGAA has spent over 300 hours and \$75,000 dollars (in addition to the 3,000 hours and \$255,000 spent by its members) already analyzing this NOPR and forecasts that additional significant analysis and cost estimates will need to be done. **INGAA therefore requests the deadline for comments to be extended from January 31, 2008 to April 30, 2008.**

Listed below are examples of INGAA's concerns regarding the presently drafted NOPR:

Operator Qualification Plan

The proposed rule requires operators to develop and implement a written Personnel Qualification Program. DOI has stated in the proposed rulemaking that a 50 hour time burden will be required to accomplish this task. INGAA members have experience in the amount of

time required for implementing an Operator Qualification Program under PHMSA and DOI has grossly underestimated the hour burden. DOI has obviously not incorporated the hour burden for contractors who may also require coverage if they perform tasks on behalf of the operator or provide qualification services such as training, testing and qualification updating. The hour burden for each member alone was on average in excess of 1100 hours for the entire process of developing PHMSA's qualification criteria, developing tests and task performance criteria, developing span of control criteria, developing procedures for management of change, as well as record keeping procedures and software.

Integrity Management Program

On January 28, 2003, the Research and Special Programs Administration (RSPA), the predecessor of the Department of Transportation's (DOT) Pipeline and Hazardous Material Safety Administration (PHMSA), proposed an Integrity Management Rule, which they considered to be a significant regulatory action (Volume 68, No. 18, Pages 4308 & 4309). Costs for this PHMSA Integrity Management Program were estimated to be \$10.3 billion for approximately 21,000 of affected pipeline mileage. Based on this number, it preliminarily estimated that this portion of the proposed MMS rulemaking may have an associated cost of \$16.1 billion for the 33,000 miles of offshore pipeline.

Just based on these two items alone, INGAA believes that DOI has incorrectly deemed this rulemaking as not significant. If you have any questions or require any additional information, please contact me at 202-216-5930.

Sincerely,

A handwritten signature in black ink that reads "Terry D. Boss". The signature is written in a cursive, flowing style.

Terry D. Boss  
Senior Vice President

CC: Office of Management and Budget (OMB)  
File